

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

JUSTIN BLAKE,

Plaintiff,

Case No: 22-CV-0970

v.

DAVID BETH et al.,

Defendants.

**PLAINTIFF'S CIVIL L. R. 7(h) EXPEDITED AND NON-DISPOSITIVE
MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENTS (Dkt. 70 and 81)**

Plaintiff Justin Blake, ("Blake" or "Plaintiff"), by and through his undersigned counsel, Motley Legal Services, files this expedited motion pursuant to Civil Local Rule 7(h) requesting a fifty-five (55) day extension to file his Responses in Opposition to Defendants' Kenosha County, Wisconsin County Mutual Insurance Company and Defendant Officers (Dkt. 81) as well as Defendant Visiting Nurse Community Care and Jessica Bergmann's (Dkt. 70) Motion for Summary Judgment.

Defendants filed their motion for summary judgment materials on January 20, 2025. Plaintiff's Response, pursuant to local rules, currently is due on February 19, 2025. I am lead Counsel for Plaintiff Blake and have several time constraints that interfere with the current deadline. Specifically, I have a jury a trial scheduled in Kenosha County Court on March 10, 2025, and a five-day jury trial in the Wisconsin Eastern District Court for case 22-CV-0856 beginning on March 17, 2025.

In addition, in *Marwan Mahajni v. Milwaukee County, et al.*, E.D. Wis. Case No. 24-CV-0416 before this Court, counsel with Crivello, Nichols, and Hall filed an

interlocutory appeal to the Seventh Circuit Court of Appeals and requested the court grant its motion to extend their principal appellate brief due date. This unexpected extension therefore requires Plaintiff-Appellee's response brief to be due on March 24, 2025, in that matter. Additionally, counsel for Plaintiffs has a presentation that she has committed to give at the University of Oxford on March 6, 2025. As responding to two summary judgment motions will require an extensive amount of time and research. In order to properly prepare opposition materials for the present case, Plaintiff is requesting an extension in good faith and due to the varying demands of other matters.

WHEREFORE, for the foregoing reasons, Plaintiff Blake respectfully requests that the Court grant his motion for an extension of time of fifty (55) days, or until April 15, 2025, to file his responses to all of the Defendants' Motions for Summary Judgment.

Dated this 29th day of January 2025.

MOTLEY LEGAL SERVICES

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